



SAXENA WHITE

10 Bank Street | 8th Floor | White Plains, NY 10606

May 7, 2021

VIA ECF

Honorable Denise L. Cote
United States District Court Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Grated,
Denise Cote
May 11, 2021

Re: *In Re Perrigo Company PLC Securities Litigation*
Case No.: 1:19-cv-00070-DLC

Dear Judge Cote:

We represent Lead Plaintiffs in the above-captioned matter. We respectfully submit this letter motion for leave to file under seal Exhibits 57-109 accompanying the Declaration of Steven B. Singer in Support of Lead Plaintiffs' Opposition to Defendants' Motions for Summary Judgment and Defendants' Motions to Exclude the Expert Testimony of Harris L. Devor and Chad C. Coffman.

Lead Plaintiffs respectfully make this request because the foregoing exhibits are comprised of testimony and/or documents that have been designated by Defendants as "confidential" or "highly confidential" under the Confidentiality Order governing this case (ECF No. 90). Further, the Court's April 5, 2021 Order (ECF No. 235) required the parties to file unredacted, public briefs in support of their Summary Judgment and *Daubert* Motions, but permitted the accompanying exhibits to be filed under seal. *Id.* at 4. However, Lead Plaintiffs take no position on the confidentiality of the aforementioned exhibits or whether said exhibits should remain under seal.

Respectfully submitted,

/s/ Steven B. Singer
Steven B. Singer

cc: Counsel for all parties (via ECF)